

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: MMA LAW FIRM, PLLC, Debtor.	§ § § § §	Chapter 11 Case No. 24-31596
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**OBJECTION TO DEBTOR’S EMERGENCY MOTION TO EXTEND THE
AUTOMATIC STAY TO JOHN ZACHARY MOSELEY PURSUANT TO 11 U.S.C
SECTIONS 362 AND 105**
[Relates to Docket No. 706]

Equal Access Justice Fund, LP and EAJF ESQ Fund, LP (collectively, “**EAJF**”) file this Objection to Debtor MMA Law Firm, PLLC’s Emergency Motion to Extend the Automatic Stay to John Zachary Moseley (“**Moseley**”) Pursuant to 11 U.S.C. Sections 362 and 105 as follows.

EAJF’s lead bankruptcy counsel, Ms. Misty Segura, is out of town until Monday, June 30th and is available at that time or afterwards. On June 25, 2025, Ms. Goott called Ms. Segura to confer about the relief the Debtor intended to request and was advised that Ms. Segura would be out of town on Friday, June 27th and over the weekend.

There is no emergency and proper notice should be required under the Bankruptcy Code. Debtor seeks to extend the stay to a non-debtor in two matters: 1) a suit brought by EAJF to collect against Moseley on a personal guaranty in Harris County District Court (“**Guaranty Action**”) and 2) a divorce proceeding in Harris County District Court between non-debtor Moseley and his wife. EAJF has filed an intervention in that matter as a result of alleged fraudulent transfers made by Mr. Moseley (individually) to his wife in violation of the Texas Uniform Fraudulent Transfer Act (“**Divorce Proceeding**”). In the Guaranty Action, there is a summary judgment scheduled for submission *more than two weeks away*. And there is no hearing currently scheduled in the divorce proceeding other than the trial scheduled for July 21st. EAJF have sought a temporary

restraining order and injunction and have requested hearing dates. They have not been scheduled for a hearing yet, and they are brought simply preserve the *status quo* pending the outcome of the Divorce Proceeding.

FOR THESE REASONS, EAJF prays that its Objection be sustained.

Dated June 27, 2025.

Respectfully submitted,

SPENCER FANE, LLP

By: /s/ Misty A. Segura
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**COUNSEL FOR EQUAL ACCESS JUSTICE
FUND, LP AND EAJF ESQ FUND, LP**

CERTIFICATE OF SERVICE

I certify that on June 27, 2025, a true and correct copy of the foregoing document was served by electronic service via the Court's ECF filing system on those parties registered to receive service.

/s/ Misty A. Segura
MISTY A. SEGURA